

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JULIAN QUARLES	:	VIOLATIONS:
	:	18 U.S.C. § 1951 (Hobbs Act extortion -
	:	2 counts)
	:	
	:	
	:	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Department of Licenses and Inspections for the City of Philadelphia (L & I) was an agency whose primary function was to administer and enforce the City's code requirements, including the zoning and fire codes and regulations. The City implemented and enforces the zoning and fire codes to ensure the safety of the public.
2. The responsibilities of L & I included regulating the conduct of businesses and persons by inspections, and by enforcing applicable codes and regulations. L & I was empowered to issue citations and condemn property for violations of the city codes.
3. L & I employed housing and fire inspectors, who were responsible for visiting residences to inspect work and insure that it was in compliance with the zoning and fire codes and ordinances, issuing violation notices where appropriate, making recommendations to

correct violations and improper conditions and making follow up inspections to insure that corrective action had been taken. Additionally, housing and fire inspectors were empowered to condemn property for violations of the city codes.

4. L & I required all employees to abide by a Code of Ethics that provided that employees “not accept, nor offer, any gift, favor or service that might tend to influence [the employee] in the discharge of [his] duties.”

5. Defendant JULIAN QUARLES was employed as a housing and fire inspector for L & I.

6. In or about May 2005 defendant JULIAN QUARLES inspected a property owned by A.H. and found numerous fire and zoning violations.

7. In or about May 2005 defendant JULIAN QUARLES accepted money from A.H. and cleared the violations, without those violations having been corrected.

8. In or about May 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIAN QUARLES

knowingly and unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that he unlawfully obtained and attempted to obtain property and things of value, that is, approximately \$45, which was not due the defendant or his office, from A.H., with the consent of A.H., under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 of Count One are realleged here.
2. In or about February 2006, defendant JULIAN QUARLES inspected a property in Philadelphia owned by A.H. and found numerous fire and zoning violations.
3. In or about February 2006, defendant JULIAN QUARLES accepted money from A.H. and cleared the violations, without those violations having been corrected.
4. On or about February 14, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIAN QUARLES

knowingly and unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that he unlawfully obtained and attempted to obtain property and things of value, that is, approximately \$300, which was not due the defendant or his office, from A.H., with the consent of A.H., under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY

